

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLEN ROBINSON,)	
)	
<i>Plaintiff,</i>)	Case No. 23 C 02724
)	
v.)	Hon. Judge Martha M. Pacold
)	District Judge
WAYNE FRANO, <i>et al.</i> ,)	
)	Mag. Judge Heather K. McShain
<i>Defendants.</i>)	
)	
)	JURY TRIAL DEMANDED
)	

JOINT STATUS REPORT

Pursuant to this Court's Order (Dkt. 67), the parties submit the following joint status report:

Progress of Discovery

1. Since the parties' last status report in this case, the parties have exchanged responses to their initial written discovery requests. Defendants have responded to Plaintiff's second set of interrogatory requests as well.

2. The parties have met and conferred on Defendants' subpoena riders, and Defendants have sent out their subpoenas to various entities. Defendants have issued approximately 17 subpoenas for records. At this time, Defendants have received responsive records from at least 2 subpoena respondents and 15 remain outstanding. Specifically, Defendants recently received responsive documents from the Cook County State's Attorney's Office and anticipate producing those records to the parties, Monday, April 1, 2024.

3. The parties have met and conferred regarding their respective versions of the Confidentiality Order and HIPAA Order and are at impasse. The parties will soon file a joint motion for a Confidentiality Order and HIPAA Order, outlining their respective positions.

Amended Pleadings

4. Plaintiff does not intend to file an amended complaint at this time.

5. Defendants' motion to dismiss Count VIII is fully briefed and currently pending before this Court.

Settlement

6. There are no current settlement discussions in this case.

Dated: March 29, 2024

RESPECTFULLY SUBMITTED,

/s/ Annie Prossnitz
Counsel for Plaintiff

Jon Loevy
Scott Rauscher
Annie Prossnitz
LOEVY & LOEVY
311 N. Aberdeen
Chicago, Illinois 60607
(312) 243-5900
prossnitz@loevy.com

/s/ Kathryn E. Boyle
*Special Assistant
Corporation Counsel*

Steven B. Borkan
Timothy P. Scahill
Misha Itchhaporia
Emily E. Schnidt
Kathryn E. Boyle
Borkan & Scahill, Ltd.
20 S. Clark St., Suite 1700
Chicago, IL 60603
(312) 580-1030
*Counsel for Defendants
Frano, Celio, Brasic,
McDermott, Folino,
Conroy, Zelig & Babich*

/s/ Katherine C. Morrison
*Special Assistant
Corporation Counsel*

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Elizabeth A. Ekl
Katherine C. Morrison
Daniel J. Burns
Dhaviella N. Harris
Reiter Burns LLP
311 S. Wacker Dr., Suite
5200
Chicago, IL 60606
*Attorneys for Defendant
City of Chicago*

CERTIFICATE OF SERVICE

I, Annie Prossnitz, an attorney, certify that on March 29, 2024, I filed the foregoing JOINT STATUS REPORT using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Annie Prossnitz

One of Plaintiff's Attorneys